

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JOHN P. “JACK” FLYNN
LESLIE A. FLYNN,

Case: 1:21-cv-02587-AS-SLC

Plaintiffs,

- against -

CABLE NEWS NETWORK, INC.,

Defendant.

**DECLARATION OF KATHERINE M. BOLGER IN SUPPORT OF DEFENDANT
CABLE NEWS NETWORK, INC.’S MOTION FOR SUMMARY JUDGMENT**

I, Katherine M. Bolger, declare as follows:

1. I am a partner at Davis Wright Tremaine LLP, counsel to Defendant Cable News Network, Inc. (“CNN”), which owns and operates numerous news platforms, including the television network CNN and the website CNN.com.

2. I make this declaration in order to annex exhibits relied upon in CNN’s Motion for Summary Judgment and Motions to Exclude Plaintiffs’ Experts Jesse Binnall and Dr. Sophia Moskalenko in the above-captioned case.

3. Annexed hereto as **Exhibit 1** is a true and correct copy of the CNN Tonight report “Watch CNN Go Inside a Gathering of QAnon Followers” (the “Report”), which originally aired on February 4, 2021, and is at issue in this lawsuit, and produced by CNN in this action¹ with the Bates stamp CNN002006, to be conventionally filed with this Court.

¹ For purposes of discovery, the parties agreed that discovery would include this action, as well as the two consolidated Middle District of Florida actions, *Valerie Flynn v. CNN*, No. 8:22-cv-00343 (M.D. Fla.), and *Lori Flynn v. CNN*, No. 8:22-cv-00512 (M.D. Fla.).

4. Annexed hereto as **Exhibit 2** is a true and correct copy of the video posted by user @GenFlynn on Twitter on July 4, 2020 (“Oath Video”), and produced in discovery by third party Sidney Powell in this action with the Bates stamp FLYNN0000135, to be conventionally filed with this Court.

5. Annexed hereto as **Exhibit 3** is a true and correct copy of the Declaration of Donie O’Sullivan, sworn to on July 12, 2023, in this action.

6. Annexed hereto as **Exhibit 4** is a true and correct copy of the Declaration of Fuzz Hogan, sworn to on July 6, 2023, in this action.

7. Annexed hereto as **Exhibit 5** is a true and correct copy of the Declaration of Emma Lacey-Bordeaux, sworn to on July 6, 2023, in this action.

8. Annexed hereto as **Exhibit 6** is a true and correct copy of the expert report of Mike Rothschild, dated June 5, 2023, in this action.

9. Annexed hereto as **Exhibit 7** is a true and correct copy of the expert report of Terri D. Giddens, Ph.D., and appendices, dated June 5, 2023, in this action.

10. Annexed hereto as **Exhibit 8** is a true and correct copy of the book PASTELS AND PEDOPHILES: INSIDE THE MIND OF QANON, written by Sophia Moskalenko, to be conventionally filed with this Court.

11. Annexed hereto as **Exhibit 9** is a true and correct copy of a video from Q Con Live!, held on October 17, 2020, in Scottsdale, Arizona, and produced by CNN in this action with the Bates stamp CNN001729, to be conventionally filed with this Court.

12. Annexed hereto as **Exhibit 10** is a true and correct copy of a video from Q Con Live!, held on October 17, 2020, in Scottsdale, Arizona, and produced by CNN in this action with the Bates stamp CNN001737, to be conventionally filed with this Court.

13. Annexed hereto as **Exhibit 11** is a true and correct copy of text messages produced by CNN in this action with the Bates stamp CNN001070-CNN001086.

14. Annexed hereto as **Exhibit 12** is a true and correct copy of emails dated February 2, 2021, and produced by CNN in this action with the Bates stamp CNN000689.

15. Annexed hereto as **Exhibit 13** is a true and correct copy of emails dated February 2, 2021, and produced by CNN in this action with the Bates stamp CNN001442.

16. Annexed hereto as **Exhibit 14** is a true and correct copy of Slack messages dated February 3, 2021, and produced by CNN in this action with the Bates stamp CNN001238-CNN001242.

17. Annexed hereto as **Exhibit 15** is a true and correct copy of emails dated February 4, 2021, and produced by CNN in this action with the Bates stamp CNN001602-CNN001604.

18. Annexed hereto as **Exhibit 16** is a true and correct copy of an email dated February 4, 2021, and produced by CNN in this action with the Bates stamp CNN000901-CNN000902.

19. Annexed hereto as **Exhibit 17** is a true and correct copy of an email dated February 4, 2021, and produced by CNN in this action with the Bates stamp CNN000892-CNN000893.

20. Annexed hereto as **Exhibit 18** is a true and correct copy of an email dated February 4, 2021, and produced by CNN in this action with the Bates stamp CNN000894-CNN000896.

21. Annexed hereto as **Exhibit 19** is a true and correct copy of emails dated February 4, 2021, and produced by CNN in this action with the Bates stamp CNN000888-CNN000891.

22. Annexed hereto as **Exhibit 20** is a true and correct copy of emails dated February 4, 2021, and produced by CNN in this action with the Bates stamp CNN000143-CNN000149.

23. Annexed hereto as **Exhibit 21** is a true and correct copy of an email dated February 4, 2021, and produced by CNN in this action with the Bates stamp CNN000339.

24. Annexed hereto as **Exhibit 22** is a true and correct copy of an email dated February 4, 2021, and produced by CNN in this action with the Bates stamp CNN000691-CNN000693.

25. Annexed hereto as **Exhibit 23** is a true and correct copy of emails dated February 4, 2021, and produced by CNN in this action with the Bates stamp CNN001326-CNN001327.

26. Annexed hereto as **Exhibit 24** is a true and correct copy of emails dated February 5, 2021, and produced by CNN in this action with the Bates stamp CNN000752-CNN000757.

27. Annexed hereto as **Exhibit 25** is a true and correct copy of emails dated February 4, 2021, and produced by CNN in this action with the Bates stamp CNN001014.

28. Annexed hereto as **Exhibit 26** is a true and correct copy of a video produced by Valerie Flynn in this action with the Bates stamp PX_189 and the time stamp 8:51:18 PM, to be conventionally filed with this Court.

29. Annexed hereto as **Exhibit 27** is a true and correct copy of a video produced by Valerie Flynn in this action with the Bates stamp PX_189 and the time stamp 9:42:20 PM, to be conventionally filed with this Court.

30. Annexed hereto as **Exhibit 28** is a true and correct copy of the transcript from the deposition of Plaintiff John P. “Jack” Flynn, taken in this action on April 24, 2023.

31. Annexed hereto as **Exhibit 29** is a true and correct copy of the transcript from the deposition of Plaintiff Leslie Flynn, taken in this action on March 9, 2023.

32. Annexed hereto as **Exhibit 30** is a true and correct copy of the transcript from the deposition of Valerie Flynn, taken in this action on April 4, 2023.

33. Annexed hereto as **Exhibit 31** is a true and correct copy of the transcript from the deposition of General Michael Flynn, taken in this action on March 10, 2023.

34. Annexed hereto as **Exhibit 32** is a true and correct copy of the transcript from the deposition of Lori Flynn, taken in this action on April 5, 2023.

35. Annexed hereto as **Exhibit 33** is a true and correct copy of the transcript from the deposition of Barbara Flynn Redgate, taken in this action on August 21, 2023.

36. Annexed hereto as **Exhibit 34** is a true and correct copy of the transcript from the deposition of Jeffrey Pedersen, taken in this action on May 15, 2023.

37. Annexed hereto as **Exhibit 35** is a true and correct copy of the transcript from the deposition of Tracy Diaz, taken in this action on March 29, 2023.

38. Annexed hereto as **Exhibit 36** is a true and correct copy of the transcript from the deposition of Jeremy S. Thomas a.k.a. J.T. Wilde, taken in this action on February 21, 2023.

39. Annexed hereto as **Exhibit 37** is a true and correct copy of the transcript from the deposition of Wilson Powell, taken in this action on May 6, 2023.

40. Annexed hereto as **Exhibit 38** is a true and correct copy of a tweet posted on July 4, 2020, by @GenFlynn that was produced in discovery in this action with the Bates stamp PX_250, and which was marked as Exhibit 25 to the deposition of Plaintiff Leslie Flynn, taken in this action on March 9, 2023.

41. Annexed hereto as **Exhibit 39** is a true and correct copy of Plaintiff Leslie Flynn's Twitter "Likes" that was produced in discovery in this action with the Bates stamp PX_289, and which was marked as Exhibit 32 to the deposition of Plaintiff Leslie Flynn, taken in this action on March 9, 2023.

42. Annexed hereto as **Exhibit 40** is a true and correct copy of a May 9, 2020, tweet posted by Plaintiff Leslie Flynn, and which was marked as Exhibit 43 to the deposition of Plaintiff Leslie Flynn, taken in this action on March 9, 2023.

43. Annexed hereto as **Exhibit 41** is a true and correct copy of a July 1, 2020, Wayback Machine capture of tweets by @GoJackFlynn, available at the URL <https://web.archive.org/web/20200701034959/http://twitter.com/gojackflynn>, and which was marked as Exhibit 328 to the deposition of Plaintiff John P. “Jack” Flynn, taken in this action on April 24, 2023.

44. Annexed hereto as **Exhibit 42** is a true and correct copy of a July 5, 2020, Wayback Machine capture of tweets by @GoJackFlynn, available at the URL <https://web.archive.org/web/20200705165722/http://twitter.com/gojackflynn>, and which was marked as Exhibit 334 to the deposition of Plaintiff John P. “Jack” Flynn, taken in this action on April 24, 2023.

45. Annexed hereto as **Exhibit 43** is a true and correct copy of a November 24, 2018, Wayback Machine capture of tweets by @FlynnJack515, available at the URL <https://web.archive.org/web/20181124141931/twitter.com/flynnjack515>, and which was marked as Exhibit 339 to the deposition of Plaintiff John P. “Jack” Flynn, taken in this action on April 24, 2023.

46. Annexed hereto as **Exhibit 44** is a true and correct copy of a April 16, 2020, Wayback Machine capture of tweets by @GoJackFlynn, available at the URL <https://web.archive.org/web/20200416111906/http://twitter.com/gojackflynn>, and which was marked as Exhibit 340 to the deposition of Plaintiff John P. “Jack” Flynn, taken in this action on April 24, 2023.

47. Annexed hereto as **Exhibit 45** is a true and correct copy of a May 9, 2020, tweet posted by Plaintiff Leslie Flynn, and which was marked as Exhibit 341 to the deposition of Plaintiff John P. “Jack” Flynn, taken in this action on April 24, 2023.

48. Annexed hereto as **Exhibit 46** is a true and correct copy of a May 18, 2020, Wayback Machine capture of tweets by @GoJackFlynn, available at the URL <https://web.archive.org/web/20200518132106/http://twitter.com/gojackflynn>, and which was marked as Exhibit 342 to the deposition of Plaintiff John P. “Jack” Flynn, taken in this action on April 24, 2023.

49. Annexed hereto as **Exhibit 47** is a true and correct copy of a July 11, 2020, Wayback Machine capture of tweets by @GoJackFlynn, available at the URL <https://web.archive.org/web/20200711024726/http://twitter.com/gojackflynn>, and which was marked as Exhibit 343 to the deposition of Plaintiff John P. “Jack” Flynn, taken in this action on April 24, 2023.

50. Annexed hereto as **Exhibit 48** is a true and correct copy of a November 9, 2019, Wayback Machine capture of tweets by @GoJackFlynn, available at the URL <https://web.archive.org/web/20191109192226/http://twitter.com/gojackflynn>, and which was marked as Exhibit 345 to the deposition of Plaintiff John P. “Jack” Flynn, taken in this action on April 24, 2023.

51. Annexed hereto as **Exhibit 49** is a true and correct copy of tweets by @GoJackFlynn, that was produced in discovery in this action with the Bates stamp PX_180, and which was marked as Exhibit 346 to the deposition of Plaintiff John P. “Jack” Flynn, taken in this action on April 24, 2023.

52. Annexed hereto as **Exhibit 50** is a true and correct copy of emails from Plaintiff John P. “Jack” Flynn, that were produced in discovery by third party True North Seafood in this action with the Bates stamp TNS0012776-TNS0012778, and which was marked as Exhibit 347 to the deposition of Plaintiff John P. “Jack” Flynn, taken in this action on April 24, 2023.

53. Annexed hereto as **Exhibit 51** is a true and correct copy of an August 21, 2020, Wayback Machine capture of tweets by @GoJackFlynn, available at the URL <https://web.archive.org/web/20200821145152/http://twitter.com/gojackflynn>, and which was marked as Exhibit 348 to the deposition of Plaintiff John P. “Jack” Flynn, taken in this action on April 24, 2023.

54. Annexed hereto as **Exhibit 52** is a true and correct copy of an August 24, 2020, Wayback Machine capture of tweets by @GoJackFlynn, available at the URL <https://web.archive.org/web/20200824201817/https://twitter.com/GoJackFlynn/>, and which was marked as Exhibit 349 to the deposition of Plaintiff John P. “Jack” Flynn, taken in this action on April 24, 2023.

55. Annexed hereto as **Exhibit 53** is a true and correct copy of emails from Plaintiff John P. “Jack” Flynn, that were produced in discovery by third party True North Seafood in this action with the Bates stamp TNS0012798-TNS0012799, and which was marked as Exhibit 351 to the deposition of Plaintiff John P. “Jack” Flynn, taken in this action on April 24, 2023.

56. Annexed hereto as **Exhibit 54** is a true and correct copy of direct messages sent by @GoJackFlynn1, that were produced in discovery in this action with the Bates stamp PX 578, and which was marked as Exhibit 352 to the deposition of Plaintiff John P. “Jack” Flynn, taken in this action on April 24, 2023.

57. Annexed hereto as **Exhibit 55** is a true and correct copy of an October 23, 2020, Archive.Today capture of tweets by @GoJackFlynn, available at the URL <https://archive.ph/Wkq0b>, and which was marked as Exhibit 353 to the deposition of Plaintiff John P. “Jack” Flynn, taken in this action on April 24, 2023.

58. Annexed hereto as **Exhibit 56** is a true and correct copy of a September 16, 2019, Wayback Machine capture of tweets by @GoJackFlynn, available at the URL <https://web.archive.org/web/20190916171650/http://twitter.com/gojackflynn>, and which was marked as Exhibit 354 to the deposition of Plaintiff John P. “Jack” Flynn, taken in this action on April 24, 2023.

59. Annexed hereto as **Exhibit 57** is a true and correct copy of emails from Plaintiff John P. “Jack” Flynn, that were produced in discovery by third party True North Seafood in this action with the Bates stamp TNS0002173-TNS0002174, and which was marked as Exhibit 356 to the deposition of Plaintiff John P. “Jack” Flynn, taken in this action on April 24, 2023.

60. Annexed hereto as **Exhibit 58** is a true and correct copy of an October 26, 2018, Wayback Machine capture of tweets by @FlynnJack515, available at the URL <https://web.archive.org/web/20181026141639/https://twitter.com/flynnjack515>, and which was marked as Exhibit 357 to the deposition of Plaintiff John P. “Jack” Flynn, taken in this action on April 24, 2023.

61. Annexed hereto as **Exhibit 59** is a true and correct copy of a November 4, 2018, Wayback Machine capture of tweets by @FlynnJack515, available at the URL <https://web.archive.org/web/20181104124938/https://twitter.com/flynnjack515>, and which was marked as Exhibit 358 to the deposition of Plaintiff John P. “Jack” Flynn, taken in this action on April 24, 2023.

62. Annexed hereto as **Exhibit 60** is a true and correct copy of a December 3, 2018, Wayback Machine capture of tweets by @FlynnJack515, available at the URL <https://web.archive.org/web/20181203022522/https://twitter.com/flynnjack515>, and which was

marked as Exhibit 359 to the deposition of Plaintiff John P. “Jack” Flynn, taken in this action on April 24, 2023.

63. Annexed hereto as **Exhibit 61** is a true and correct copy of a December 21, 2018, Wayback Machine capture of tweets by @FlynnJack515, available at the URL <https://web.archive.org/web/20181221133523/https://twitter.com/flynnjack515>, and which was marked as Exhibit 360 to the deposition of Plaintiff John P. “Jack” Flynn, taken in this action on April 24, 2023.

64. Annexed hereto as **Exhibit 62** is a true and correct copy of a September 16, 2019, Wayback Machine capture of tweets by @GoJackFlynn, available at the URL <https://web.archive.org/web/20190916171650/http://twitter.com/gojackflynn>, and which was marked as Exhibit 361 to the deposition of Plaintiff John P. “Jack” Flynn, taken in this action on April 24, 2023.

65. Annexed hereto as **Exhibit 63** is a true and correct copy of a retweet from @GoJackFlynn, which was produced in discovery as PX_200, and which was marked as Exhibit 363 to the deposition of Plaintiff John P. “Jack” Flynn, taken in this action on April 24, 2023.

66. Annexed hereto as **Exhibit 64** is a true and correct copy of a September 18, 2020, Wayback Machine capture of tweets by @GoJackFlynn, available at the URL <https://web.archive.org/web/20200918012457/http://twitter.com/gojackflynn>, and which was marked as Exhibit 370 to the deposition of Plaintiff John P. “Jack” Flynn, taken in this action on April 24, 2023.

67. Annexed hereto as **Exhibit 65** is a true and correct copy of an email to Joseph Flynn, which was produced in discovery as PX_0718-PX_0720, and which was marked as Exhibit 376 to the deposition of Plaintiff John P. “Jack” Flynn, taken in this action on April 24, 2023.

68. Annexed hereto as **Exhibit 66** is a true and correct copy of a July 7, 2021, tweet posted by @MadMerlin5, available at the URL <https://twitter.com/MadMerlins/status/1412807406636130309>, and which was marked as Exhibit 383 to the deposition of Plaintiff John P. “Jack” Flynn, taken in this action on April 24, 2023.

69. Annexed hereto as **Exhibit 67** is a true and correct copy of a screenshot of a video posted on Rumble at the URL <https://rumble.com/v147csk-tribute-to-veronica-wolski-the-peoples-bridge.html>, and which was marked as Exhibit 385 to the deposition of John P. “Jack” Flynn, taken in this action on April 24, 2023.

70. Annexed hereto as **Exhibit 68** is a true and correct copy of a retweet from Plaintiff John P. “Jack” Flynn, and which was marked as Exhibit 386 to the deposition of Plaintiff John P. “Jack” Flynn, taken in this action on April 24, 2023.

71. Annexed hereto as **Exhibit 69** is a true and correct copy of text messages between Plaintiff John P. “Jack” Flynn and Veronica Wolski, which was produced in discovery as PX_102-108, and which was marked as Exhibit 387 to the deposition of Plaintiff John P. “Jack” Flynn, taken in this action on April 24, 2023.

72. Annexed hereto as **Exhibit 70** is a true and correct copy of a June 29, 2020, Wayback Machine capture of a tweet by @WgaBrittany, available at the URL <https://web.archive.org/web/20200629224419/https://twitter.com/WgaBrittany/status/1277734296065921025>, and which was marked as Exhibit 137 to the deposition of Lori Flynn, taken in this action on April 5, 2023.

73. Annexed hereto as **Exhibit 71** is a true and correct copy of a July 2, 2020, Wayback Machine capture of a tweet by @CourtSalinas, available at the URL <https://web.archive.org/web/20200702182245/https://twitter.com/CourtSalinas/status/127874727>

[9441223690](#), and which was marked as Exhibit 138 to the deposition of Lori Flynn, taken in this action on April 5, 2023.

74. Annexed hereto as **Exhibit 72** is a true and correct copy of Facebook messages, dated between June 19, 2020 – February 17, 2022, produced in discovery in this action with the Bates stamp PX_599, and which was marked as Exhibit 161 to the deposition of Lori Flynn, taken in this action on April 5, 2023.

75. Annexed hereto as **Exhibit 73** is a true and correct copy of a July 5, 2020, Wayback Machine capture of tweets by @lofly727, available at the URL <http://web.archive.org/web/20200705170010/https://twitter.com/lofly727>, and which was marked as Exhibit 168 to the deposition of Lori Flynn, taken in this action on April 5, 2023.

76. Annexed hereto as **Exhibit 74** is a true and correct copy of Facebook messages between May 17, 2018 – February 17, 2022, produced in discovery in this action with the Bates stamp PX_599, and which was marked as Exhibit 136 to the deposition of Lori Flynn, taken in this action on April 5, 2023.

77. Annexed hereto as **Exhibit 75** is a true and correct copy of an email dated December 21, 2020, and produced in discovery in this action with the Bates stamp PX_0674-PX_0676, and which was marked as Exhibit 80 to the deposition of General Michael Flynn, taken in this action on March 10, 2023.

78. Annexed hereto as **Exhibit 76** is a true and correct copy of a June 7, 2019, Wayback Machine capture of tweets by @intheMatrixxx, available at the URL <http://web.archive.org/web/20190607153128/https://twitter.com/intheMatrixxx>, and which was marked as Exhibit 407 to the deposition of Jeffrey Pedersen, taken in this action on May 15, 2023.

79. Annexed hereto as **Exhibit 77** is a true and correct copy of Instagram messages between March 31, 2018 – July 11, 2022, produced in discovery in this action with the Bates stamp PX_581, and which was marked as Exhibit 365 to the deposition of Plaintiff John P. “Jack” Flynn, taken in this action on April 24, 2023.

80. Annexed hereto as **Exhibit 78** is a true and correct copy of Plaintiffs John P. “Jack” Flynn and Leslie Flynn’s April 25, 2022, Objections and Answers to Defendant’s Interrogatories, which were marked as Exhibit 23 to the deposition of Plaintiff Leslie Flynn, taken in this action on March 9, 2023.

81. Annexed hereto as **Exhibit 79** is a true and correct copy of Plaintiffs John P. “Jack” Flynn and Leslie Flynn’s June 14, 2022, First Amended and Supplemental Rule 26(a)(1) Disclosures.

82. Annexed hereto as **Exhibit 80** is a true and correct copy of Q Drop 513, dated January 9, 2018, and available at the URL <https://qposts.online/post/513>.

83. Annexed hereto as **Exhibit 81** is a true and correct copy of Q Drop 1183, dated April 19, 2018, and available at the URL <https://qposts.online/post/1183>.

84. Annexed hereto as **Exhibit 82** is a true and correct copy of Q Drop 2147, dated September 10, 2018, and available at the URL <https://qposts.online/post/2147>.

85. Annexed hereto as **Exhibit 83** is a true and correct copy of Q Drop 3924, dated April 9, 2020, and available at the URL <https://qposts.online/post/3924>.

86. Annexed hereto as **Exhibit 84** is a true and correct copy of Q Drop 4506, dated June 24, 2020, and available at the URL <https://qposts.online/post/4506>.

87. Annexed hereto as **Exhibit 85** is a true and correct copy of Q Drop 4510, dated June 24, 2020, and available at the URL <https://qposts.online/post/4510>, and which was marked

as Exhibit 327 to the deposition of Plaintiff John P. “Jack” Flynn, taken in this action on April 24, 2023.

88. Annexed hereto as **Exhibit 86** is a true and correct copy of Q Drop 4881, dated October 17, 2020, and available at the URL <https://qposts.online/post/4881>.

89. Annexed hereto as **Exhibit 87** is a true and correct copy of an article entitled “Here are the QAnon supporters running for Congress in 2020” by Alex Kaplan, published on Media Matters for America on January 7, 2020, available at the URL <https://www.mediamatters.org/qanon-conspiracy-theory/here-are-qanon-supporters-running-congress-2020>.

90. Annexed hereto as **Exhibit 88** is a true and correct copy of an article entitled “Michael Flynn Is Now Selling QAnon Merch” by Will Sommer, published on Daily Beast on December 29, 2020, available at the URL [https:// www.thedailybeast.com/michael-flynn-is-now-selling-qanon-merch](https://www.thedailybeast.com/michael-flynn-is-now-selling-qanon-merch).

91. Annexed hereto as **Exhibit 89** is a true and correct copy of an article entitled “Trump praises QAnon conspiracies, appreciates support” by Zeke Miller, Jill Colvin, and Amanda Seitz, published on Associated Press on August 19, 2020, available at the URL <https://apnews.com/article/election-2020-ap-top-news-religion-racial-injustice-535e145ee67dd757660157be39d05d3f>.

92. Annexed hereto as **Exhibit 90** is a true and correct copy of an article entitled “Veronica Wolski, QAnon supporter at center of ivermectin firestorm, dies of COVID-related pneumonia at Chicago hospital” by John Keilman, published on The Chicago Tribune on September 13, 2021, available at the URL <https://www.chicagotribune.com/news/breaking/ct->

[ivermectin-covid-chicago-veronica-wolski-dies-20210913-w6pryhlesncctnd6epoemlbbxu-story.html](https://www.ivermectin-covid-chicago-veronica-wolski-dies-20210913-w6pryhlesncctnd6epoemlbbxu-story.html).

93. Annexed hereto as **Exhibit 91** is a true and correct copy of a list of third-party reporting on the Oath Video between July 2020-February 2021, which was attached as Exhibit 73 to the June 5, 2023, expert report of Mike Rothschild filed in this action.

94. Annexed hereto as **Exhibit 92** is a true and correct copy of an article entitled “Michael Flynn posts video featuring QAnon slogans” by Marshall Cohen, published on CNN on July 7, 2020, available at the URL <https://www.cnn.com/2020/07/07/politics/michael-flynn-qanon-video/index.html>.

95. Annexed hereto as **Exhibit 93** is a true and correct copy of an article entitled “Michael Flynn recites oath of office using slogan associated with QAnon” by Jerry Dunleavy, published on Washington Examiner on July 5, 2020, available at the URL <https://www.washingtonexaminer.com/news/michael-flynn-recites-oath-of-office-using-slogan-associated-with-qanon>.

96. Annexed hereto as **Exhibit 94** is a true and correct copy of an article entitled “Mike Flynn swears allegiance to QAnon in Fourth of July video” by Roger Sollenberger, published on Salon on July 6, 2020, available at the URL <https://www.salon.com/2020/07/06/mike-flynn-swears-allegiance-to-qanon-in-fourth-of-july-video/>.

97. Annexed hereto as **Exhibit 95** is a true and correct copy of an article entitled “‘Where We Go One We Go All’: General Michael Flynn celebrates July 4th by leading his friends in reciting the oath to the Constitution AND the slogan for QAnon conspiracy theorists” by Megan Sheets, published on The Daily Mail on July 5, 2020, available at the URL

<https://www.dailymail.co.uk/news/article-8491799/General-Michael-Flynn-leads-friends-reciting-oath-Constitution-QAnon-slogan-July-4th.html>.

98. Annexed hereto as **Exhibit 96** is a true and correct copy of an article entitled “Twitter tries to catch the QAnon horse that bolted” by Donie O’Sullivan, published on CNN on July 22, 2020, available at the URL <https://www.cnn.com/2020/07/22/tech/qanon-twitter-ban-analysis/index.html>.

99. Annexed hereto as **Exhibit 97** is a true and correct copy of an article entitled “Sidney Powell is a beacon of hope to sad Qanon supporters” by Donie O’Sullivan, published on CNN on November 24, 2020, available at the URL <https://www.cnn.com/2020/11/24/business/sidney-powell-qanon/index.html>.

100. Annexed hereto as **Exhibit 98** is a true and correct copy of an article entitled “Analysis: A CNN reporter went to two different QAnon events. Here’s what he found” by Donie O’Sullivan, published on CNN on October 19, 2020, available at the URL <https://www.cnn.com/2020/10/19/tech/qanon-events-cnn-reporter/index.html>.

101. Annexed hereto as **Exhibit 99** is a true and correct copy of a February 4, 2021, tweet posted by @donie, available at the URL <https://twitter.com/donie/status/1357513155849633793>.

102. Annexed hereto as **Exhibit 100** is a true and correct copy of a February 5, 2021, tweet posted by @donie, available at the URL <https://twitter.com/donie/status/1357554846027681794?s=20>.

103. Annexed hereto as **Exhibit 101** is a true and correct copy of a June 15, 2021, tweet posted by @donie, available at the URL <https://twitter.com/donie/status/1404889150113955851>.

104. Annexed hereto as **Exhibit 102** is a true and correct copy of a photograph of Plaintiff John P. “Jack” Flynn holding a sticker with the words “Q SENT ME,” another individual holding a sticker with the words “CNN SUCKS,” and General Michael Flynn holding what appears to a photograph, available at the URL <https://daniel-ed-morrison.medium.com/how-q-came-to-be-7b05e7b10ab5>. A version of this photograph accompanies the tweet annexed hereto as Exhibit 66.

105. Annexed hereto as **Exhibit 103** is a true and correct copy of Facebook messages produced in discovery in this action with the Bates stamp PX_274-PX_288.

106. Annexed hereto as **Exhibit 104** is a true and correct copy of Plaintiff Leslie Flynn’s August 10, 2023, Answer to Defendant’s Fourth Interrogatory.

107. Annexed hereto as **Exhibit 105** is a true and correct copy of a blog post entitled “An update following the riots in Washington, DC,” published by Twitter Safety on January 12, 2021, on Twitter, available at the URL https://blog.twitter.com/en_us/topics/company/2021/protecting--the-conversation-following-the-riots-in-washington--.

108. Annexed hereto as **Exhibit 106** is a true and correct copy of an email dated August 23, 2019, and produced in discovery by third party Sidney Powell in this action with the Bates stamp FLYNN0000010-FLYNN0000012, and which was marked as Exhibit 231 to the deposition of Joseph Flynn, taken in this action on April 12, 2023.

109. Annexed hereto as **Exhibit 107** is a true and correct copy of a video produced by Valerie Flynn in this action with the Bates stamp PX_189 and the time stamp 9:44:02 PM, to be conventionally filed with this Court.

110. Annexed hereto as **Exhibit 108** is a true and correct copy of tweets posted by @GoJackFlynn, produced in discovery in this action with the Bates stamp PX_427, and which was marked as Exhibit 337 to the deposition of Plaintiff John P. “Jack” Flynn, taken in this action on April 24, 2023.

111. Annexed hereto as **Exhibit 109** is a true and correct copy of tweets posted by @SidneyPowell1, produced in discovery in this action with the Bates stamp PX_203-PX_209, and which was marked as Exhibit 336 to the deposition of Plaintiff John P. “Jack” Flynn, taken in this action on April 24, 2023.

112. Annexed hereto as **Exhibit 110** is a true and correct copy of a screenshot of a video posted on Rumble at the URL <https://rumble.com/v147csk-tribute-to-veronica-wolski-the-peoples-bridge.html>, and which was marked as Exhibit 384 to the deposition of John P. “Jack” Flynn, taken in this action on April 24, 2023.

113. Annexed hereto as **Exhibit 111** is a true and correct copy of internet forum postings, available at the URL <https://dchan.qorigins.org/qresearch/res/10553774.html#10554341>, and which was marked as Exhibit 355 to the deposition of John P. “Jack” Flynn, taken in this action on April 24, 2023.

114. Annexed hereto as **Exhibit 112** is a true and correct copy of the transcript from the deposition of Jennifer Freitas, taken in this action on April 13, 2023.

115. Annexed hereto as **Exhibit 113** is a true and correct copy of an email dated December 21, 2020, and produced in discovery in this action with the Bates stamp PX_0674-PX_0676, and which was marked as Exhibit 80 to the deposition of General Michael Flynn, taken in this action on March 10, 2023.

116. Attached as **Exhibit 114** is a true and correct copy of the Expert Report of Dr. Sophia Moskalenko, served in this action on June 5, 2023.

117. Attached as **Exhibit 115** is a true and correct copy of the Rebuttal Expert Report of Dr. Sophia Moskalenko, served in this action on June 20, 2023.

118. Attached as **Exhibit 116** is a true and correct copy of the transcript from the deposition of Dr. Sophia Moskalenko, taken in this action on June 23, 2023.

119. Attached as **Exhibit 117** is a true and correct copy of the Expert Report of Jesse R. Binnall, served in this action on January 31, 2023.

120. Attached as **Exhibit 118** is a true and correct copy of the transcript from the deposition of Jesse R. Binnall, taken in this action on June 26, 2023.

121. On September 5, 2023, I received an email from Jesse Binnall, informing me that his firm Binnall Law Group would “be substituting in as counsel” for this action, as well as the related Middle District of Florida actions brought by Valerie Flynn and Lori Flynn. Over the next few weeks, Mr. Binnall led many of the initial discussions with CNN’s counsel related to his firm’s representation of the Flynn plaintiffs in these actions.

122. At the deposition of Plaintiff John P. “Jack” Flynn on April 24, 2023, Plaintiff stated that he would have to speak to his attorney, Steven Biss, as to whether he was seeking damages for medical harm as a result of the Report. Neither Plaintiff nor Mr. Biss ever followed up with CNN’s counsel on the issue.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: October 27, 2023

/s/ Katherine M. Bolger
Katherine M. Bolger